

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE )	No. 2:12-md-02323-AB
PLAYERS' CONCUSSION INJURY )	MDL No. 2323
LITIGATION )	
)	
Kevin Turner and Shawn Wooden, )	
on behalf of themselves and others )	Hon. Anita B. Brody
similarly situated, )	Civ. Action No. 14-00029-
)	
)	
Plaintiffs, )	
)	
v. )	
)	
National Football League and )	
NFL Properties, LLC, )	
Successor-in-interest to )	
NFL Properties, Inc., )	
)	
Defendants. )	
)	
THIS DOCUMENT RELATES TO: )	
ALL ACTIONS )	
)	

**JOINDER OF SMITH STALLWORTH PA  
IN MOTION BY THE LOCKS LAW FIRM FOR  
APPOINTMENT OF ADMINISTRATIVE CLASS COUNSEL**

On March 20, 2018, The Locks Law Firm filed a Motion seeking the appointment of administrative class counsel (Doc. 9786). SMITH AND STALLWORTH PA joins in The Locks Law Firm's motion.

The firm has over 50 pre-effective date claims. In order to ensure the Settlement Agreement is appropriately implemented and interpreted the appointment of administrative class counsel is necessary at this time. Given the volume of players of represented, Locks Law Firm is

best situated to serve as administrative class counsel. Further, this firm, as well as others, anticipate handling NFL claims for years into the future. The class will be best served having an administrative counsel actively dealing with pending claims now and in the future.

WHEREFORE, Smith and Stallworth respectfully requests that the Court appoint The Locks Law Firm and/or another firm as Administrative Class Counsel. Wherefore the Firm request a hearing on the above.

DATED: April 3, 2018.

Respectfully submitted,  
Mark Stallworth, Esquire

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